

KING & SPALDING

King & Spalding LLP
1185 Avenue of the Americas
New York, NY 10036-4003

Tel: (212) 556-2100
Fax: (212) 556-2222
www.kslaw.com

Arthur Steinberg
Direct Dial: 212-556-2158
asteinberg@kslaw.com

August 6, 2015

VIA E-MAIL TRANSMISSION AND ECF FILING

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Letter Regarding Status of Pillars' No Stay Pleading

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“New GM”) in the above-referenced matter. We write to provide the Court, pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], with an update on developments in proceedings relating to New GM’s Motions to Enforce.

As the Court was informed by New GM’s letter dated July 24, 2015 [Dkt. No. 13320] (“July 24 Letter”), New GM filed with the United States District Court for the Eastern District of Michigan (“Michigan District Court”), in the case captioned *Pillars v. General Motors LLC*, Case No. 15-11360 (“Pillars Lawsuit”), a *Motion For Leave To File Amended Notice Of Removal And Amended Answer* (“Motion to Amend”). On August 5, 2015, the Michigan District Court granted the Motion to Amend (“Order”), which permits New GM to amend its Answer and Notice of Removal to correct the inadvertent error respecting the language found in Section 2.3(a)(ix) of the Sale Agreement. A copy of the Order is attached hereto as **Exhibit A**.

Pursuant to the Order, New GM filed: (i) *General Motors LLC’s First Amended Answer to Plaintiffs Amended Complaint*, and (ii) *Defendant’s Amended Notice of Removal*, in the

Honorable Robert E. Gerber
Aug. 6, 2015
Page 2

Michigan District Court, which corrected the inadvertent error. Copies of these pleadings are attached hereto as **Exhibits B** and **C**, respectively.

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd
Encl.

cc: Victor J. Mastromarco (counsel for Mr. Pillars)
Russell C. Babcock (counsel for Mr. Pillars)
Edward S. Weisfelner
Howard Steel
Sander L. Esserman
Jonathan L. Flaxer
S. Preston Ricardo
Matthew J. Williams
Lisa H. Rubin
Keith Martorana
Daniel Golden
Deborah J. Newman
Jamison Diehl
William Weintraub
Steve W. Berman
Elizabeth J. Cabraser
Robert C. Hilliard